

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**U.S. EQUAL EMPLOYMENT)
OPPORTUNITY COMMISSION,)**

Plaintiff,)

Civil Action No. 2:21-cv-01220-JFC

v.)

COASTAL DRILLING EAST, LLC,)

and)

COASTAL WELL SERVICE, LLC,)

Defendants.)

VERDICT SLIP

- 1. Do you find by a preponderance of the evidence that Andre Pryce was subjected to unlawful racial harassment by one or more non-supervisors and that Defendant Coastal Drilling East, LLC knew or reasonably should have known of that harassment and failed to exercise reasonable care to prevent and promptly correct it?**

 ✓ **YES** **NO**

Instructions: Go on to Question No. 2 and answer that Question.

- 2. Do you find by a preponderance of the evidence that Andre Pryce was subjected to unlawful racial harassment by one or more supervisors and that Defendant Coastal Drilling East, LLC has not proven its affirmative defense to liability for unlawful racial harassment by preponderance of the evidence?**

 ✓ **YES** **NO**

Instructions: Go on to Question No. 3 and answer that Question.

3. Do you find by a preponderance of the evidence that Defendant Coastal Drilling East, LLC created or permitted working conditions that were sufficiently intolerable that a reasonable person in Andre Pryce's circumstances would have felt compelled to resign his employment and that Mr. Pryce resigned because of those working conditions?

☒ YES ☐ NO

Instructions: If you answered "Yes" to one or more of Questions 1, 2 or 3, then go on to Question No. 4 and answer that Question.

If you answered "No" to all three Questions, then do not answer any of the questions below because you have now completed this verdict slip. The Foreperson and each juror should sign and date page 4 of the verdict slip.

4. What is the amount of compensatory damages that should be awarded to Andre Pryce? \$ 24,375.00

Instructions: Go on to Question No. 5 and answer that Question. The matter set forth in this paragraph is agreed upon by the parties.

5. Do you find by a preponderance of the evidence that Defendant Coastal Drilling East, LLC acted with malice or reckless indifference to Andre Pryce's federal law rights?

☐ YES ☒ NO

Instructions: If your answer to Question No. 5 is "Yes," go on to Question No. 6 and answer that Question.

If your answer to Question No. 5 is "No," then do not answer any of the questions below because you have now completed this verdict slip. The Foreperson and each juror should sign and date page 4 of the verdict slip.

6. Do you find by a preponderance of the evidence that Defendant Coastal Drilling East, LLC made good-faith efforts to comply with federal law by both adopting policies and procedures designed to prevent unlawful racial harassment and intolerable working conditions and acting to affirmatively enforce those policies and procedures?

_____ YES _____ NO

Instructions: If your answer to Question No. 6 is “No,” go on to Question No. 7 and answer that Question.

If your answer to Question No. 6 is “Yes,” then do not answer any of the questions below because you have now completed this verdict slip. The Foreperson and each juror should sign and date the verdict slip below.

7. What is the amount of punitive damages that should be awarded to Andre Pryce?

\$ _____

Instructions: You have now completed this verdict slip. The Foreperson and each juror should sign and date page 4 of the verdict slip.

- Please sign and date page 4 of this verdict slip. -

Members of the Jury

Dated: 12/4/2023

1. Plaudman, Amy
Foreperson
2. Darby Ryan
3. Theresa
4. Debra
5. Wanda
6. Frederic
7. Joe Mangel
8. Jessica Bailey